

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT FUND OF ILLINOIS, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 23 C 4826
)	
PORTEX BROTHERS CONSTRUCTION, INC., an Illinois corporation, f/k/a PORTER BROTHERS ASPHALT & SEALING, INC.,)	JUDGE THOMAS M. DURKIN
)	
Defendant,)	

PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, PORTER BROTHERS CONSTRUCTION, INC., an Illinois corporation, f/k/a PORTER BROTHERS ASPHALT & SEALING, INC., in the total amount of \$28,617.56, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,644.00.

On July 31, 2023, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on August 21, 2023. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Catherine M. Chapman

Catherine M. Chapman
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 31st day of August 2023:

Trent L. Bush, Registered Agent
Porter Brothers Construction, Inc.
202 East Fifth Street
Sterling, IL 61081-3651

/s/ Catherine M. Chapman

Catherine M. Chapman
Attorneys for the Plaintiffs
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